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October 14, 2022

VIA HAND-DELIVERY & PDF

Mr. William D. Chan, Program Manager
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, Maryland 21215

**Re: Avenues Recovery Center of Maryland
Establishment of 20 bed Track One Intermediate
Care Facility providing ASAM Level III.7 and
Level III.7-WM services
Matter # 22 -04-2455**

Dear Mr. Chan:

In response to the concerns raised by Mr. Parker and Ms. Hawk at our 10/12/2022 meeting, Avenues-Prince Frederick has decided to reconfigure the room space for patients who will be receiving ASAM 3.7WM and 3.7 levels of care services. There will be: (a) 2 bedrooms with 4 beds and (b) 4 bedrooms with 3 beds and all of these beds will be located on the second floor, as shown on the floor plan in Exhibit 41 and identified as bedrooms #1, 8, 9, 7, 11, and 12. Rooms 1 and 7 will have four beds, each with 320.5 square feet of space (about 80 square feet per patient) and Rooms 8, 9, 11, and 12 will have three beds, each with 281.5 square feet (about 94 square feet per patient). As indicated on the floor plans, there are more than 3 feet of space between each bed and each bedroom has its own private bathroom.

These rooms were selected because they are on the far ends of the second floor hallway and they allow for gender specific sides. In addition, these rooms are the furthest from the lounge and gym thus keeping these bedrooms away from areas with loud volumes, however, the patients in 3.7and 3.7WM are more than welcome to join their peers in the lounge area if they are feeling up to it. These bedrooms are in the closest proximity to the fire escape routes that lead directly outside of the second floor.

During the Avenues call with Commission Staff, the Avenues team discussed a concern about patients who may be at risk for falling while in withdrawal/detoxification levels of care. This concern is mitigated in this reconfiguration. Avenues is equipped with medical equipment that can assist these patients move around freely including canes, walkers, and a wheelchair. These rooms still are near the medication room that also doubles as a nurse's office so these patients have access to medical staff at any given time.

Avenues fully encourages peer support, starting day one of a patient's treatment, to engage the patient who may have thoughts of leaving treatment early which can cause an inherent risk if the patient does not complete his or her medication regimen and adhere to his or her individualized treatment plan. Having individuals room with those who are undergoing the same withdrawal and with a similar history to one another helps formulate a relationship for motivation.

In our 10/12/2022 meeting you asked Avenues to cite the research supporting communal rooming in substance abuse rehabilitation. As previously submitted in the second completeness response, there is research that shows the benefits of having roommates in a residential setting:

As evidenced during the pandemic and in previously submitted research in the CON application for Avenues-Cambridge, isolation leads to drug use and/or relapse. To reduce isolation and provide a peer supported atmosphere, Avenues-Prince Frederick firmly believes that when patients share a space with others who are going through the same experiences, they (i) are better adjusted to the environment, (ii) understand that it's okay to feel the way they are feeling, and (iii) understand that they are not alone while they go through rehab. Nurses will check in on the patients on an hourly basis enhancing quality of care. Patient safety can only increase with more eyes and support from a peer environment. Lastly, it is believed that because patients are not isolated while in 3.7 and 3.7WM, there will be less chances for AMA risks. Reduced isolation also will improve outcomes of patients who are receiving 3.7 and 3.7WM services.

See study "Psychiatric consultations in less than private places: Challenges and unexpected benefits of hospital roommates," published by Neir Eshel, Ph. D, MD candidate, David Marcovitz, MD, and Theodore Stern, MD. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4724323/>

However, the possible benefits of multi-bed rooms are often overlooked. In particular, several studies have shown that patients appreciate the social support that roommates provide. Roommates help mitigate feelings of loneliness or isolation, provide a ready companion at difficult moments, increase safety by keeping a close watch on the other patient's condition, and may be a source of useful information. Indeed, when patients are asked for their preference (i.e., single room or semi-private room) the majority of patients prefer multiple-bed rooms. In one small study, for example, 18 out of 20 Danish cancer patients preferred to be hospitalized in multiple-bed rooms unless they became too ill to interact."

and,

One of the hang ups that people often have going into an inpatient alcohol treatment facility is the fact that they will likely have to have a roommate. The problem is that this is done by design. The people who set up the rehab likely made this choice consciously with the clients in mind. It is not to be able to fit more people into the facility to make more money. Instead, it is to help you succeed.

During alcohol treatment, many recovering alcoholics want to isolate themselves. They want to hide in a corner and wallow in their pain and misery. While this may be helpful for some, to some extent, it causes far more harm than good to most.

<https://talk.recovery.org/discussion/4373/why-roommates-in-inpatient-alcohol-treatment-are-often-required/>

Avenues believes the proposed reconfiguration meets the socialization requirements above and addresses the concerns of the Commission Staff. Avenues thanks the Staff for their time and consideration and looks forward to approval of this needed project in Prince Frederick Maryland.

Of course, Avenues is available to respond to any additional questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Carolyn Jacobs" followed by a stylized flourish.

Carolyn Jacobs

cc: Paul Parker
Wynee Hawk
Ruby Potter
Jamie Schleicher
Nikki Berger
Andy Solberg

